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6 *[Proposed] Counsel to the Debtor*

7 **UNITED STATES BANKRUPTCY COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

10 In re:

11 INTERNATIONAL LONGSHORE  
12 AND WAREHOUSE UNION,

13 Debtor.

14 Case No. 23-30662-HLB

15 Chapter 11

16 **APPLICATION OF THE DEBTOR FOR  
17 ORDER APPROVING DESIGNATION OF  
18 WILLIAM E. ADAMS AS RESPONSIBLE  
19 INDIVIDUAL PURSUANT TO LOCAL  
20 RULE 4002-1**

21 [No Hearing Requested]

22 Pursuant to Rule 4002-1 of the Bankruptcy Local Rules for the Northern District of California  
23 (the “Local Rules”), the International Longshore and Warehouse Union (“ILWU” or “Debtor”), the  
24 debtor and debtor in possession in the above captioned chapter 11 case (the “Chapter 11 Case”), hereby  
25 applies (the “Application”) for the entry of an order approving the designation of William E. Adams,  
the President of ILWU, as its designated responsible individual during the Chapter 11 Case. In support  
of this Application, the Debtor respectfully represents as follows:

26 1. On September 30, 2023, the Debtor filed a voluntary petition for relief under subchapter  
27 V of chapter 11 of Title 11 of the United States Code.

28 2. The Debtor is organized under the laws of the State of California as a labor  
organization.

3. William E. Adams, the President of ILWU, is authorized to act on behalf of the Debtor  
in all matters relating to the Chapter 11 Case.

4. By this Application, the Debtor seeks to approve the appointment of William E. Adams as the designated individual with primary responsibility for the duties and obligations of the Debtor.

5. Mr. Adams' contact information is:

William E. Adams  
1188 Franklin Street, 4th Floor  
San Francisco, CA 94109  
Telephone: (415) 775-0533  
Email: [president@ilwu.org](mailto:president@ilwu.org)

**WHEREFORE**, the Debtor respectfully requests that this Court enter an order designating William E. Adams, the President of the ILWU, as the natural person to be responsible for the duties and obligations of the Debtor during the Chapter 11 Case. A proposed form of order is attached hereto as Exhibit A.

Dated: October 1, 2023

## PACHULSKI STANG ZIEHL & JONES LLP

*/s/ Debra I. Grassgreen*

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Debra I. Grassgreen  
Jason H. Rosell

*[Proposed] Counsel to the Debtor*

# **EXHIBIT A**

## **Proposed Order**

1 PACHULSKI STANG ZIEHL & JONES LLP  
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UNITED STATES BANKRUPTCY COURT  
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Case No. 23-30662-HLB

Chapter 11

**ORDER APPROVING DESIGNATION OF  
WILLIAM E. ADAMS AS RESPONSIBLE  
INDIVIDUAL PURSUANT TO LOCAL  
RULE 4002-1**

14 The Court having considered the *Application of the Debtor for Order Approving Designation of*  
15 *William E. Adams as Responsible Individual Pursuant to Local Rule 4002-1* [Docket No. •] (the  
16 “Application”) and finding that good cause exists for the relief requested,

17 **IT IS HEREBY ORDERED THAT:**

18 1. The Application is **GRANTED**.  
19 2. William E. Adams is appointed as the responsible individual for the Debtor for  
20 purposes of this Chapter 11 Case pursuant to Local Rule 4002-1.  
21 3. Mr. Adams’ contact information is:

22 William E. Adams  
23 1188 Franklin Street, 4th Floor  
24 San Francisco, CA 94109  
Telephone: (415) 775-0533  
Email: [president@ilwu.org](mailto:president@ilwu.org)

26 **\*\* END OF ORDER \*\***  
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